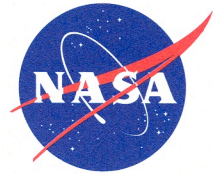


National Aeronautics and Space Administration  
Headquarters  
Washington, DC 20546-0001



August 19, 2011

General Law Practice Group  
Reply to Attn of:

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA employees at the Space Transportation Association (STA) Luncheon on September 8, 2011

On September 8, 2011, the Space Transportation Association (STA), a nonprofit organization under 501(c)(6) of the Internal Revenue Code, will host a luncheon at the 2325 Rayburn Office Building in Washington, D.C. from 11:30 AM to 1:00 PM. STA member organizations that support STA activities include Aerojet, ATK, Honeywell, ITT, Lockheed Martin, Orbital, Paragon, Pratt & Whitney Rocketdyne, United Launch Alliance, United Space Alliance, and Wyle.

The luncheon will include a speech by Bill Gerstenmaier, Associate Administrator for Space Operations at NASA, followed by a question and answer period. Approximately 300 people have been invited to attend from the White House, Congress, the media, the aerospace industry, and NASA, FAA, and DoD. The estimated cost of the luncheon, including all food and beverages, is \$25 per person. I find that the event meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g)(2).

I further determine that there is an Agency interest in having NASA personnel attend the event because it will further Agency programs or operations. Attendance at the event will allow NASA attendees to exchange information regarding various NASA programs. Accordingly, NASA employees whose duties do not substantially affect the sponsors, including NASA employees in non-career positions who are required to sign the ethics pledge under Executive Order 13490, may accept an invitation for free attendance.

Moreover, NASA employees whose duties may substantially affect the STA or a majority of its members, such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.204(g)(3)(i) regarding participation in this event from their local ethics counselor.

A handwritten signature in blue ink, appearing to read "Adam F. Greenstone".

Adam F. Greenstone